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April 14, 2020

Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 1106  
New York, N.Y. 10007

Application Granted. Defendant Sharma's conditions of bail are temporarily modified to permit him to possess a computer without accessing the internet while at his residence in the Southern District of Florida during this COVID-19 pandemic. All other conditions of bail shall remain in effect. The Clerk of the Court is directed to terminate the letter motion at docket number 332.

Dated: April 15, 2020  
New York, New York

Re: *U.S. v. Sharma, et. al.*, 18-cr-340 (LGS)

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Your Honor:

Due to the COVID-19 national emergency, I am writing to request a modification of Defendant, Sam Sharma's bail conditions in this case to allow him to possess a computer without accessing the internet while he is at his residence in the Southern District of Florida during this COVID-19 pandemic.

If allowed by the Court, Mr. Sharma will be using a computer to access and review his case materials without accessing the internet. There is no internet capability at the residence except for Ms. Brielle Farkas' password protected mobile hotspot that Mr. Sharma does not have access to. Mr. Sharma will be using a computer with a copy of the electronic discovery provided to him by the defense team and will not have access to Ms. Farkas' computer. The Wi-Fi card in Mr. Sharma's computer will be disabled and probation will be allowed to spot check the computer for internet use.

Mr. Sharma's bail conditions currently require, among other things, home detention of Sharma and a prohibition barring Sharma from having any access to the internet except at counsel's office under the supervision of counsel or staff for the purpose of the defense of this case and the Centra Tech, Inc., civil matter in the Southern District of Florida. Ms. Farkas is allowed to have her smartphone at the residence she shares with Mr. Sharma. [ECF 100] Additionally, the Court recently modified the bond conditions to allow Ms. Farkas to be able to use her password protected work computer with a password protected hotspot only in a secure room that Mr. Sharma can not enter or have access to. [ECF 322]

Mr. Sharma is requesting the bond be modified to allow him to have access to his own computer with the Wi-Fi card disabled to review the discovery materials and prepare his defense. Sharma's current internet restrictions shall remain in place and he shall not access the internet at his residence. Both Mr. Sharma and Ms. Farkas have previously agreed to permit United States Probation to perform site-visits or searches at the residence without prior warning at any time Probation determines in its discretion it is appropriate to do so. Probation will also be allowed to spot check Mr. Sharma's computer for internet usage. Once the COVID-19 pandemic restrictions are lifted allowing Sharma to return to counsel's office this condition can be deleted.

Counsel has conferred with Florida Southern District Probation Department, pretrial services division, and has confirmed Mr. Sharma has been compliant with all his bond conditions.

Counsel has conferred with the government and the probation officer from the Southern District of Florida who agree to this motion.

Therefore, Mr. Sharma respectfully requests this Court enter an order granting this motion.

Sincerely yours,

s/Gennaro Cariglio  
Gennaro Cariglio Jr., Esq.  
Atty. for Sohrab Sharma